

THOMAS E. KIMBLE, ESQ
Illinois Bar No. 6257935
THE BERNHOFT LAW FIRM, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
(512) 582-2100 telephone
(512) 373-3159 facsimile
tekimble@bernhoflaw.com

JOEL F. HANSEN, ESQ.
Nevada Bar No. 1876
HANSEN & HANSEN, LLC
9030 W. Cheyenne Ave. #210
Las Vegas, Nevada 89129
(702) 906-1300: office
(702) 620-5732: facsimile
efile@hansenlawyers.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, UNIFIED DATA
SERVICES, LLC, COMPLIANCE
CONSULTANTS, LLC, and AMERICAN
TECHNOLOGY SERVICES, LLC,

Plaintiffs,

v.

UNITED STATES FEDERAL TRADE
COMMISSION,

Defendants.

Case No. 2:19-cv-698 -JCM-VCF

**STIPULATION TO EXTEND TIME TO
FILE PROPOSED SCHEDULING ORDER
(First Request)**

Plaintiff Richard Zeitlin (“Zeitlin”), along with the Plaintiff companies set forth in the caption above, (hereinafter the “Plaintiffs”), by and through undersigned counsel of record, files this Stipulation to Extend Time to File Proposed Scheduling Order. This Stipulation is filed pursuant to LR 6-1 and LR 6-2. This is the first request to file an extension of time to file the Joint Proposed Scheduling Order.

Defendant Federal Trade Commission filed a motion to dismiss on June 28, 2019. (ECF No. 19). By docket order entered that same day, the Court ordered the Parties to submit a Joint Proposed

1 Scheduling Order by August 12, 2019. The Parties need additional time to exchange drafts of the
2 proposed scheduling order and confer before filing the joint proposed scheduling order. Therefore, the
3 Parties have stipulated to a three-day extension to file the proposed scheduling order, from Monday
4 August 12, 2019 to Thursday August 15, 2019.
5

6
7 Respectfully submitted by
8 THE BERNHOFT LAW FIRM, S.C.

9 /s/ Thomas E. Kimble
10 THOMAS E. KIMBLE, ESQ
11 Illinois Bar No, 6257935
12 1402 E. Cesar Chavez Street
13 Austin, Texas 78702
14 Attorney for Plaintiffs, *pro hac vice*

15 Dated: August 12, 2019

16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 August 13, 2019

20 DATED: _____
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Certificate of Service

I hereby certify that on August 12, 2019, I electronically filed and served the foregoing STIPULATION TO EXTEND TIME TO FILE PROPOSED SCHEDULING ORDER with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Thomas E. Kimble
Thomas E. Kimble
Attorney for Plaintiffs